



Regional Contract Office,
BADEN WÜRTTEMBERG
Government Purchase Card
Up To \$25,000
**Cardholder/Approving
Official Training**

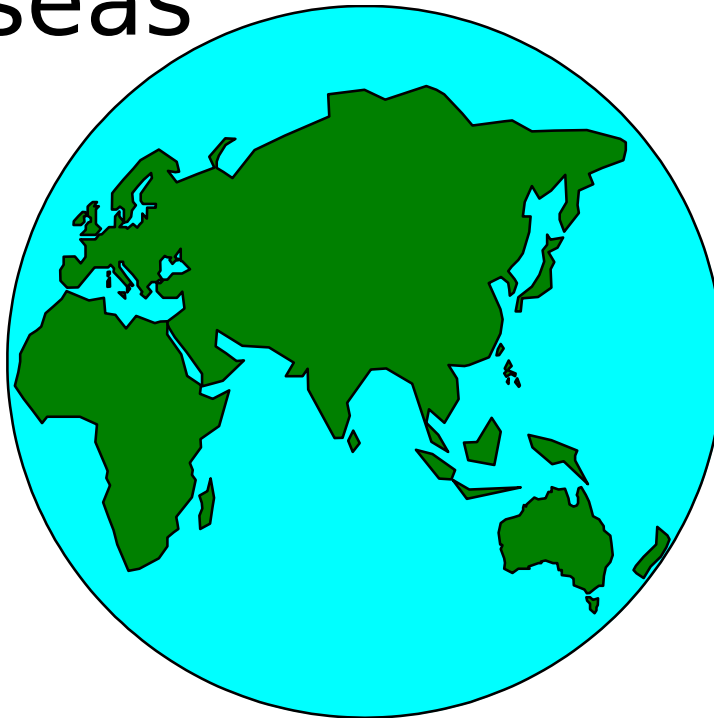
CURRENT IMPAC USES

- To procure supplies and services valued up to \$3,000
- Minor construction or repairs up to \$2,000
- Method of Payment against a contractual document up to \$999,999.99



NEW EXPANSION

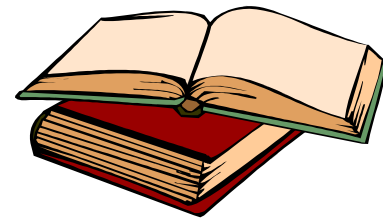
- A stand-alone basis up to \$25K for overseas



DFARS 213.301

Simplified Acquisition Procedures

- DFARS 213.301 - Authorizes use of IMPAC as stand alone purchase/payment method when
(1) the purchase:
 - Is made OCONUS for use OCONUS
 - Is for a commercial item, but is not for work performed by employees recruited within CONUS



DFARS 213.301

Simplified Acquisition Procedures

- DFARS 213.301 - Authorizes use of IMPAC as stand alone purchase/payment method when
(1) the purchase (continued):
 - Is not for supplies or services originating from, or transported through, sources identified in FAR 25.7 (restricted countries)
 - Is not for ball or roller bearings as end items, and does not require access to classified or privacy act information, and

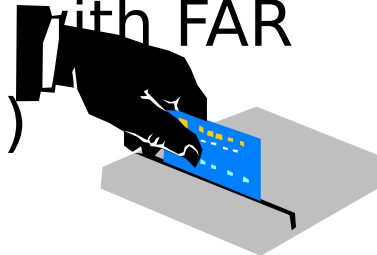


DFARS 213.301

Simplified Acquisition Procedures

(2) the individual making the purchase

- Is authorized and trained in accordance with agency procedures
- Complies with FAR 8.001 (JWOD) when making the purchase
- Seeks maximum practicable competition for the purchase in accordance with FAR 13.104(b) (solicit three sources)



DFARS 213.301

Simplified Acquisition Procedures

- Commercial item procurement
 - All purchases under this program are required to be commercial items, IAW FAR 2.101
 - A commercial item is any item other than real property, that is of a type customarily used for non-governmental purposes and that -
 - has been sold, leased or licensed to the general public; or
 - has been offered for sale, lease or license to the general public

DFARS 213.301

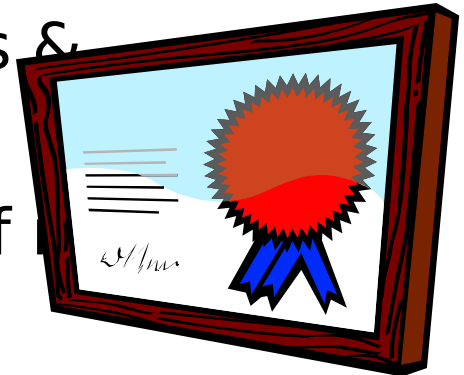
Simplified Acquisition Procedures

- The procuring of commercial services will be coordinated with each servicing Contracting Office.
 - The DFARS term includes:
 - Installation services
 - Maintenance services
 - Repair services
 - Training services
- As long as services are procured in support of a commercial item



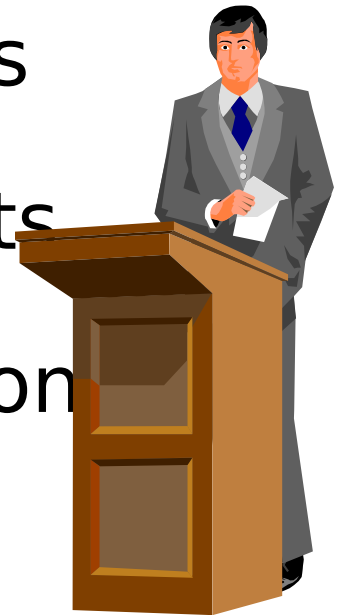
\$25K IMPLEMENTATION

- Appointment letter for Delegation of purchase authority IAW DFARS 213.301
 - Issued by Chief of Contracting Office, BADEN WÜRTTEMBERG to cardholder by name
 - Contains authority, limitations & requirements
 - Requires acknowledgement of



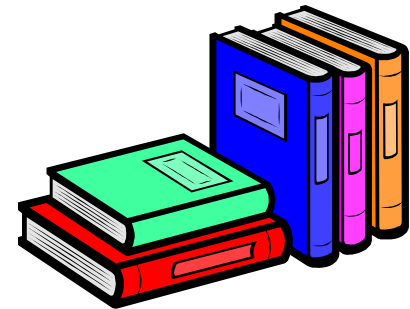
TRAINING REQUIREMENTS

- Law, Regulations, Policies, Procedures
- Required Source of Supply and Service
- Simplified Acquisition Procedures
- File Documentation Requirements
- Maximum practicable Competition



Law, Regulations, Policies, Procedures

- DFARS 201.603-3 (Appointment Authority)
- DFARS 213.301 (Simplified Acquisition Procedures)



Required Source of Supply and Service

- IAW FAR Part 8.001, agencies shall satisfy requirements for supplies and services from or through priority sources prior to purchasing on the open market

Javits-Wagner-O'Day Act

- Referred to as “the JWOD Act”
- Named for its enabling legislation, the Javits-Wagner -O'Day Act of 1971
- “Ability One” will replace acronym “JWOD”
- 41 U.S.C.46-48c
- FAR Subpart 8.7



Ability One - A Required Source

of Supplies and Services

- The JWOD Act requires Federal Agencies to purchase products manufactured by nonprofit participating agencies, the National Industries for the Blind (NIB) and National Industries for the Severely Handicapped (NISH).



JWOD Program

- Use of GPC OCONUS Up to \$25K, require Cardholders to comply with the JWOD Act.
- Compliance with JWOD can be accomplished by purchasing items of supplies and services identified by the SKILCRAFT trademark.

JWOD Sources of Supply

- On-line ordering with www.abilityone.com
- GSA Advantage
- GSA Federal Supply Schedule
- Here in OCONUS, the local Army/Air Force Exchange Service is a primary commercial source



WWW.abilityone.com

- Non-availability from ABILITY ONE on-line must be determined prior to purchase of a product from any other source.
- Determine if a product is available from JWOD by accessing JWOD on-line at **www.abilityone.com.**
- Print out non-availability as file documentation.

GSA Advantage

- Offers on-line shopping service
- www.arnet.gov or www.acq.osd.mil/dp
- Allows Cardholders to search product specific information (NSN, part number or common name).
- Review delivery options
- Places the order directly with the vendor

Army/Air Force Exchange Service

- AAFES is a source that retails some Ability One products.
- It must be determined that the AAFES product was made by the Industries for the Blind and Severely Handicapped.

Federal Supply Schedule (FSS) Program

- Directed and Managed by GSA
- www.fss.gsa.gov
- A simplified process for purchasing commercial supplies and services at prices associated with volume buying.
- GSA seeks competition, determines price reasonableness, and considers small business set-aside when it solicits and awards contracts to vendors.

FSS Program CONT'D

- Schedule-type contracts are established with contractors to provide supplies and services at stated prices for given periods of time.
- When using FSS, the Cardholder DOES NOT need:
 - to seek further competition
 - synopsise the requirement or
 - make a separate determination of price reasonableness

FSS Program CONT'D

- GSA has already determined the prices of items under schedule contracts to be fair and reasonable.
- Cardholder purchasing against a schedule contract concludes that the order represents the “best value” and results in the lowest overall cost alternative (considering price, special features, administrative costs, etc.) to meet the Governments need.

FSS Program CONT'D

Ordering Procedures

- Ordering procedures at or under micro-purchase threshold (\$3,000 or less)
 - Cardholders can place an order of supply or service with any FSS contractor

FSS Program CONT'D

Ordering Procedures

- Ordering procedures exceeding the micro-purchase threshold
 - Cardholders should place an order of supply or service with the scheduled contractor that can provide the supply or service that represents the “best value”.
 - i.e. before placing an order of supply or service, the cardholder should consider all available information about the item offered under “Multiple Award Schedules” (MAS)

FSS Program CONT'D

Ordering Procedures

- Orders placed under MAS, use the procedures in FAR Subpart 8.4, which are considered to be issued pursuant to full and open competition.
- i.e. when placing an order of supply or service that exceeds the micro-purchase threshold, the cardholder should review at least three (3) schedule contractors and select the supply or service that represents the “best value”.

FSS Program CONT'D

Ordering Procedures

- “Best Value” representation of an item includes consideration of all available information such as:
 - price
 - best delivery options
 - special features of the supply or service
 - trade in considerations
 - warranty considerations
 - maintenance availability
 - etc

FSS Program CONT'D

Ordering Procedures

- The cardholder shall document the file with his selection of the item that represents the “best value”.
- i.e. the cardholder shall document the file as to why this particular GSA schedule contractor was used although he did not offer the lowest price.

MAXIMIZING COMPETITION

OPEN MARKET NON-GSA BUYS EXCEEDING \$3,000

- Competition requirements (FAR 13.106)
 - Orally solicit at least three sources to promote competition to maximum extent
 - When possible, solicit two sources not solicited on previous purchase
 - In rare circumstances, it may be necessary to solicit only one source
 - Urgency, Exclusive Licensing Arrangements
 - **MUST be approved by Chief of Contracting Office, RCO, BADEN WÜRTTEMBERG**

DOCUMENTING PRICE REASONABLENESS

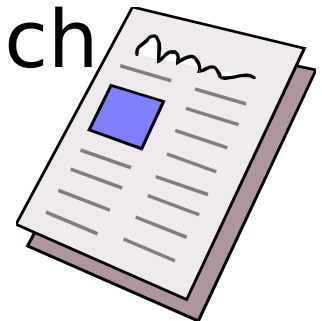
FOR OPEN MARKET PURCHASES (NON-GSA)

- Before award, the cardholder shall determine and document that the proposed price is fair and reasonable:
 - Base price reasonableness on competitive quotes
 - If only one response is received, include a statement of price reasonableness in purchase file, the statement may be based on:
 - Market research
 - Comparison of proposed price with price found reasonable on previous purchases



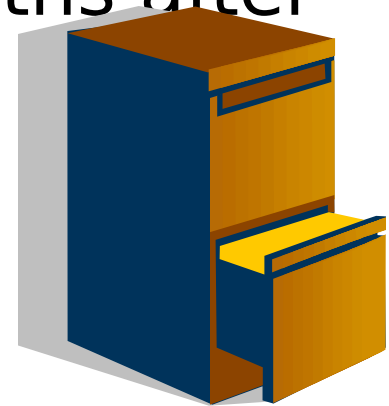
DOCUMENTING PRICE REASONABLENESS CONT'D

- Current price lists, catalogs, or advertisements
 - Comparison with similar items in a related industry
 - Any other reasonable basis
- Complete the “GPC Cardholder’s Determination of Price Reasonableness” Form for each purchase made.



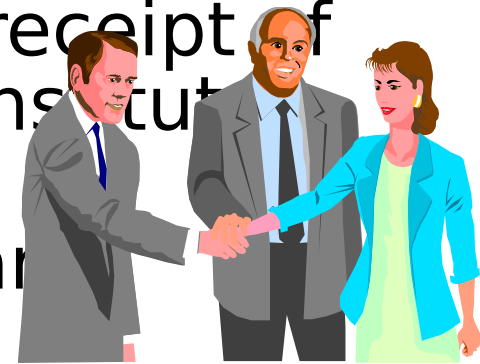
FILE DOCUMENTATION & REPORTING REQUIREMENTS

- Complete the “ABSTRACT OF OFFERS” with names/phone numbers of sources contacted
- File retention - maintain documentation for six years and three months after final payment by DFAS-E.



STANDARD OF CONDUCT

- STANDARD OF CONDUCT
 - GPCholders (U.S.) must comply with DOD 5500.7-r
 - LN cardholders must comply with UR 690-64
 - Acknowledgement of receipt of appointment letter constitutes willingness to comply with standard of conduct



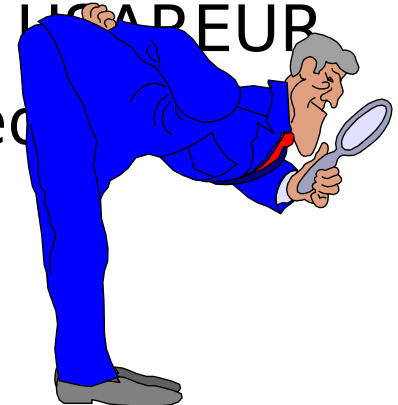
PROPERTY ACCOUNTABILITY

- Property Accountability
 - All non-expendable personal property items and all durable items purchased by GPC must be reported to the appropriate accountable officer for inclusion in government property books; retain copy of DA Form 3161 in files.
 - Contact property book officer (PBO) to determine whether item is accountable property



OVERSIGHT

- Oversight
 - Level IV APC will:
 - Conduct surveillance of 100% of cardholder transactions between \$3,000 - \$25,000 at a minimum on semi-annual basis (every 6 months)
 - Report surveillance results to LEA/DEUR
Level III APC in format directed



SUMMARY OF KEY POINTS

- The purchase must be made for use OCONUS by OCONUS cardholder.
- Purchases between \$3,000 - \$25,000 require competition IAW FAR 13.104 and 13.106

SUMMARY OF KEY POINTS CONT'D

- Cardholders must document purchases using provided forms
- RCO, BADEN WÜRTTEMBERG A/OPC will conduct 100% surveillance of purchases